

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Joint Administration Pending)

**THIRD AMENDED² NOTICE OF FILING OF CHAPTER 11 PETITIONS
AND RELATED MOTIONS AND DECLARATIONS**

PLEASE TAKE NOTICE that on November 11, 2022 and, with respect to Debtor West Realm Shires Inc., on November 14, 2022, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

A. VOLUNTARY CHAPTER 11 PETITIONS

1. Voluntary Petition – Alameda Research LLC, Case No. 22-11066 (JTD) [D.I. 1]
2. Voluntary Petition – Alameda Research Ltd, Case No. 22-11067 (JTD) [D.I. 1]
3. Voluntary Petition – FTX Trading Ltd, Case No. 22-11068 (JTD) [D.I. 1]
4. Voluntary Petition – Alameda Research Holdings Inc., Case No. 22-11069 (JTD) [D.I. 1]
5. Voluntary Petition – Clifton Bay Investments LLC, Case No. 22-11070 (JTD) [D.I. 1]
6. Voluntary Petition – West Realm Shires Services Inc., Case No. 22-11071 (JTD) [D.I. 1]
7. Voluntary Petition – West Realm Shires Financial Services Inc., Case No. 22-11072 (JTD) [D.I. 1]
8. Voluntary Petition – Ledger Holdings Inc., Case No. 22-11073 (JTD) [D.I. 1]
9. Voluntary Petition – FTX Japan Holdings K.K., Case No. 22-11074 (JTD) [D.I. 1]
10. Voluntary Petition – FTX Europe AG, Case No. 22-11075 (JTD) [D.I. 1]

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Amended items appear in bold.

11. Voluntary Petition – FTX Property Holdings Ltd, Case No. 22-11076 (JTD) [D.I. 1]
12. Voluntary Petition – LT Baskets Ltd., Case No. 22-11077 (JTD) [D.I. 1]
13. Voluntary Petition – Alameda TR Ltd, Case No. 22-11078 (JTD) [D.I. 1]
14. Voluntary Petition – Allston Way Ltd, Case No. 22-11079 (JTD) [D.I. 1]
15. Voluntary Petition – Analisya Pte Ltd, Case No. 22-11080 (JTD) [D.I. 1]
16. Voluntary Petition – Atlantis Technology Ltd., Case No. 22-11081 (JTD) [D.I. 1]
17. Voluntary Petition – Bancroft Way Ltd, Case No. 22-11082 (JTD) [D.I. 1]
18. Voluntary Petition – Blue Ridge Ltd, Case No. 22-11083 (JTD) [D.I. 1]
19. Voluntary Petition – Cardinal Ventures Ltd, Case No. 22-11084 (JTD) [D.I. 1]
20. Voluntary Petition – Cedar Bay Ltd, Case No. 22-11085 (JTD) [D.I. 1]
21. Voluntary Petition – Liquid Securities Singapore Pte Ltd, Case No. 22-11086 (JTD) [D.I. 1]
22. Voluntary Petition – Maclaurin Investments Ltd., Case No. 22-11087 (JTD) [D.I. 1]
23. Voluntary Petition – Mangrove Cay Ltd, Case No. 22-11088 (JTD) [D.I. 1]
24. Voluntary Petition – Paper Bird Inc, Case No. 22-11089 (JTD) [D.I. 1]
25. Voluntary Petition – Pioneer Street Inc., Case No. 22-11090 (JTD) [D.I. 1]
26. Voluntary Petition – Quoine India Pte Ltd, Case No. 22-11091 (JTD) [D.I. 1]
27. Voluntary Petition – Quoine Vietnam Co. Ltd, Case No. 22-11092 (JTD) [D.I. 1]
28. Voluntary Petition – SNG INVESTMENTS YATIRIM VE DANIŞMANLIK ANONİM ŞİRKETİ, Case No. 22-11093 (JTD) [D.I. 1]
29. Voluntary Petition – Strategy Ark Collective Ltd., Case No. 22-11094 (JTD) [D.I. 1]
30. Voluntary Petition – Technology Services Bahamas Limited, Case No. 22-11095 (JTD) [D.I. 1]
31. Voluntary Petition – Verdant Canyon Capital LLC, Case No. 22-11096 (JTD) [D.I. 1]
32. Voluntary Petition – West Innovative Barista Ltd., Case No. 22-11097 (JTD) [D.I. 1]
33. Voluntary Petition – Western Concord Enterprises Ltd., Case No. 22-11098 (JTD) [D.I. 1]

34. Voluntary Petition – FTX Equity Record Holdings Ltd, Case No. 22-11099 (JTD) [D.I. 1]
35. Voluntary Petition – FTX Exchange FZE, Case No. 22-11110 (JTD) [D.I. 1]
36. Voluntary Petition – FTX Hong Kong Ltd, Case No. 22-11112 (JTD) [D.I. 1]
37. Voluntary Petition – FTX Japan K.K., Case No. 22-11113 (JTD) [D.I. 1]
38. Voluntary Petition – FTX Japan Services KK, Case No. 22-11114 (JTD) [D.I. 1]
39. Voluntary Petition – Alameda Aus Pty Ltd, Case No. 22-11115 (JTD) [D.I. 1]
40. Voluntary Petition – Alameda Research (Bahamas) Ltd, Case No. 22-11116 (JTD) [D.I. 1]
41. Voluntary Petition – Alameda Research KK, Case No. 22-11100 (JTD) [D.I. 1]
42. Voluntary Petition – Alameda Research Pte Ltd, Case No. 22-11107 (JTD) [D.I. 1]
43. Voluntary Petition – Alameda Research Yankari Ltd, Case No. 22-11108 (JTD) [D.I. 1]
44. Voluntary Petition – Alameda TR Systems S. de R. L., Case No. 22-11109 (JTD) [D.I. 1]
45. Voluntary Petition – Blockfolio, Inc., Case No. 22-11110 (JTD) [D.I. 1]
46. Voluntary Petition – Clifton Bay Investments Ltd, Case No. 22-11111 (JTD) [D.I. 1]
47. Voluntary Petition – Cottonwood Grove Ltd, Case No. 22-11112 (JTD) [D.I. 1]
48. Voluntary Petition – Crypto Bahamas LLC, Case No. 22-11113 (JTD) [D.I. 1]
49. Voluntary Petition – Deep Creek Ltd, Case No. 22-11114 (JTD) [D.I. 1]
50. Voluntary Petition – Digital Custody Inc., Case No. 22-11115 (JTD) [D.I. 1]
51. Voluntary Petition – FTX (Gibraltar) Ltd, Case No. 22-11116 (JTD) [D.I. 1]
52. Voluntary Petition – FTX Canada Inc, Case No. 22-11117 (JTD) [D.I. 1]
53. Voluntary Petition – FTX Digital Holdings (Singapore) Pte Ltd, Case No. 22-11118 (JTD) [D.I. 1]
54. Voluntary Petition – FTX Products (Singapore) Pte Ltd, Case No. 22-11119 (JTD) [D.I. 1]
55. Voluntary Petition – FTX Services Solutions Ltd., Case No. 22-11120 (JTD) [D.I. 1]
56. Voluntary Petition – FTX Structured Products AG, Case No. 22-11122 (JTD) [D.I. 1]
57. Voluntary Petition – FTX Trading GmbH, Case No. 22-11123 (JTD) [D.I. 1]
58. Voluntary Petition – FTX Zuma Ltd, Case No. 22-11124 (JTD) [D.I. 1]

59. Voluntary Petition – Global Compass Dynamics Ltd., Case No. 22-11125 (JTD) [D.I. 1]
60. Voluntary Petition – Goodman Investments Ltd., Case No. 22-11126 (JTD) [D.I. 1]
61. Voluntary Petition – Hawaii Digital Assets Inc., Case No. 22-11127 (JTD) [D.I. 1]
62. Voluntary Petition – Innovatia Ltd, Case No. 22-11128 (JTD) [D.I. 1]
63. Voluntary Petition – Island Bay Ventures Inc, Case No. 22- 11129 (JTD) [D.I. 1]
64. Voluntary Petition – Killarney Lake Investments Ltd, Case No. 22-11131 (JTD) [D.I. 1]
65. Voluntary Petition – Zubr Exchange Ltd, Case No. 22-11132 (JTD) [D.I. 1]
66. Voluntary Petition – Alameda Global Services Ltd., Case No. 22-11134 (JTD) [D.I. 1]
67. Voluntary Petition – Cottonwood Technologies Ltd., Case No. 22-11136 (JTD) [D.I. 1]
68. Voluntary Petition – Deck Technologies Holdings LLC, Case No. 22-11138 (JTD) [D.I. 1]
69. Voluntary Petition – Deck Technologies Inc., Case No. 22-11139 (JTD) [D.I. 1]
70. Voluntary Petition – Euclid Way Ltd, Case No. 22-11141 (JTD) [D.I. 1]
71. Voluntary Petition – FTX Digital Assets LLC, Case No. 22-11143 (JTD) [D.I. 1]
72. Voluntary Petition – FTX EMEA Ltd., Case No. 22-11145 (JTD) [D.I. 1]
73. Voluntary Petition – FTX US Trading, Inc., Case No. 22-11149 (JTD) [D.I. 1]
74. Voluntary Petition – Hive Empire Trading Pty Ltd, Case No. 22-11150 (JTD) [D.I. 1]
75. Voluntary Petition – Liquid Financial USA Inc., Case No. 22-11151 (JTD) [D.I. 1]
76. Voluntary Petition – LiquidEX LLC, Case No. 22-11152 (JTD) [D.I. 1]
77. Voluntary Petition – North Dimension Inc, Case No. 22-11153 (JTD) [D.I. 1]
78. Voluntary Petition – North Wireless Dimension Inc, Case No. 22-11153 (JTD) [D.I. 1]
79. Voluntary Petition – LedgerPrime Bitcoin Yield Enhancement Master Fund LP, Case No. 22-11155 (JTD) [D.I. 1]
80. Voluntary Petition – LedgerPrime Digital Asset Opportunities Fund, LLC, Case No. 22-11156 (JTD) [D.I. 1]
81. Voluntary Petition – LedgerPrime Digital Asset Opportunities Master Fund LP, Case No. 22-11157 (JTD) [D.I. 1]

82. Voluntary Petition – Ledger Prime LLC, Case No. 22-11158 (JTD) [D.I. 1]
83. Voluntary Petition – LedgerPrime Ventures, LP, Case No. 22-11159 (JTD) [D.I. 1]
84. Voluntary Petition – North Dimension Ltd, Case No. 22-11160 (JTD) [D.I. 1]
85. Voluntary Petition – Quoine Pte Ltd, Case No. 22-11161 (JTD) [D.I. 1]
86. Voluntary Petition – Cedar Grove Technology Services, Ltd, Case No. 22-11162 (JTD) [D.I. 1]
87. Voluntary Petition – DAAG Trading, DMCC, Case No. 22-11163 (JTD) [D.I. 1]
88. Voluntary Petition – FTX Certificates GmbH, Case No. 22-11164 (JTD) [D.I. 1]
89. Voluntary Petition – FTX Crypto Services Ltd., Case No. 22-11165 (JTD) [D.I. 1]
90. Voluntary Petition – FTX EU Ltd., Case No. 22-11166 (JTD) [D.I. 1]
91. Voluntary Petition – FTX Lend Inc., Case No. 22-11167 (JTD) [D.I. 1]
92. Voluntary Petition – FTX Marketplace, Inc., Case No. 22-11168 (JTD) [D.I. 1]
93. Voluntary Petition – FTX Switzerland GmbH, Case No. 22-11169 (JTD) [D.I. 1]
94. Voluntary Petition – FTX TURKEY TEKNOLOJİ VE TİCARET ANONİM ŞİRKET, Case No. 22-11170 (JTD) [D.I. 1]
95. Voluntary Petition – FTX US Services, Inc., Case No. 22-11171 (JTD) [D.I. 1]
96. Voluntary Petition – FTX Ventures Ltd, Case No. 22-11172 (JTD) [D.I. 1]
97. Voluntary Petition – GG Trading Terminal Ltd, Case No. 22-11173 (JTD) [D.I. 1]
98. Voluntary Petition – Good Luck Games, LLC, Case No. 22-11174 (JTD) [D.I. 1]
99. Voluntary Petition – Hannam Group Inc, Case No. 22-11175 (JTD) [D.I. 1]
100. Voluntary Petition – Hilltop Technology Services LLC, Case No. 22-11176 (JTD) [D.I. 1]
101. Voluntary Petition – LedgerPrime Bitcoin Yield Enhancement Fund, LLC, Case No. 22-11177 (JTD) [D.I. 1]
102. Voluntary Petition – West Realm Shires Inc., Case No. 22-11183 (JTD) [D.I. 1]

B. FIRST DAY DECLARATION

1. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
2. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]
3. **Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]**
4. **Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]**

C. FIRST DAY MOTIONS

1. Motion of Debtors for Entry of an Order (I) Authorizing Joint Administration of the Debtors' Chapter 11 Cases and (ii) Granting Certain Related Relief [D.I. 3, filed on November 14, 2022]
2. Motion of Debtors for Entry of an Order (I) Modifying Certain Creditor List Requirements; (II) Authorizing the Debtors to Serve Certain Parties by E-Mail; and (III) Granting Related Relief [D.I. 9, filed on November 14, 2022]
3. Emergency Motion Pursuant to Fed R. Bankr. P. 1014(B) (I) to Transfer Chapter 15 Proceeding Relating to FTX Digital Markets Ltd. and (II) for a Stay [D.I. 22, filed on November 17, 2022]
4. Motion of Debtors for Entry of an Order Enforcing Sections 362, 365(e)(1), 525 and 541 of the Bankruptcy Code [D.I. 25, filed on November 17, 2022]
5. Motion of Debtors for Entry of an Order (I) Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Granting Certain Related Relief [D.I. 26, filed on November 17, 2022]
6. Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Kroll Restructuring Administration LLC as Claims and Noticing Agent Effective Nunc Pro Tunc to the Petition Date [D.I. 28, filed on November 17, 2022]
7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief [D.I. 45, filed on November 19, 2022]
8. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors, Foreign Vendors, 503(B)(9) Claimants and Lien Claimants, (II) Granting Administrative Expense Priority to All Undisputed

Obligations on Account of Outstanding Orders, (III) Authorizing All Financial Institutions to Honor All Related Payment Requests and (IV) Granting Certain Related Relief [D.I. 46, filed on November 19, 2022]

9. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Operate A Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(B) and (III) Granting Certain Related Relief [D.I. 47, filed on November 19, 2022]
10. Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and Claims of Worthless Stock Deductions and (II) Granting Certain Related Relief [D.I. 49, filed on November 19, 2022]
11. Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Compensation and Benefits and (B) Continue Compensation and Benefits and (II) Granting Certain Related Relief [D.I. 50, filed on November 19, 2022]
12. **[SEALED] Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors, in Their Sole Discretion, to Provide Indemnification and Exculpation to Certain Individuals, (B) Authorizing Certain Actions Pursuant to Section 363 of the Bankruptcy Code, and (C) Granting Certain Related Relief [D.I. 94, filed on November 22, 2022]**
13. **Motion of Debtors for Entry of an Order (A) Authorizing the Debtors to File the Indemnification and Exculpation Motion Under Seal and (B) Granting Related Relief [D.I. 95, filed on November 22, 2022]**

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Motions (the “First Day Hearing”) is scheduled for **November 22, 2022 at 11:00 a.m. (ET)** and will be held before the Honorable Judge T. Dorsey, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

ALL PARTICIPANTS, INCLUDING ATTORNEYS INTENDING TO PRESENT AT THE HEARING AND WITNESSES, MUST BE PHYSICALLY PRESENT IN THE COURTROOM. ANY NON-PARTICIPANTS MAY VIEW THE HEARING VIA ZOOM BY REGISTERING IN ADVANCE PURSUANT TO THE INSTRUCTIONS TO BE SET FORTH IN THE AGENDA FOR THE HEARING. COURT CALL WILL NOT BE USED TO DIAL IN.

PLEASE TAKE FURTHER NOTICE that copies of the documents referenced above may be obtained free of charge from the website of the Debtors’ notice and claims agent at <https://cases.ra.kroll.com/FTX>. You may also obtain copies from the Court’s website at www.deb.uscourts.gov for a fee.

Dated: November 22, 2022
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Proposed Counsel for the Debtors
and Debtors-in-Possession*